

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
BONNIE S. MAULDIN	:	CASE NO. 1-17-01241-RNO
	Debtor	:
		:
M&T BANK	:	Motion for Relief From Stay
	Movant	:
	v.	:
		:
BONNIE S. MAULDIN	:	:
CHARLES J. DEHART, III, CH. 13	:	:
TRUSTEE,	:	:
	Respondents	:

**ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY
FILED BY M&T BANK**

Comes Now, Debtor, Bonnie S. Mauldin, by and through her counsel, Lisa A. Rynard, Esquire, and Answers the Motion for Relief from the Automatic Stay filed by M&T Bank, as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. No response necessary. The documents speak for themselves.
5. Admitted.
6. Admitted in part, denied in part. It is admitted that upon the filing of the

Motion Debtor was had failed to make the monthly post-petition mortgage payments for July 2017 through October 2017. It is denied that the account remains post due for July 2017. Strict proof otherwise is demanded at hearing.

7. Denied. It is denied that the amount necessary to reinstate the loan is \$4,275.16. Debtor has recently made and Movant has accepted three (3) payments in the amount of \$1,068.79. Strict proof otherwise is demanded at hearing.

8. Denied. Movant is without cause and strict proof is demanded at hearing.

9. Denied. Movant is without cause and strict proof is demanded at hearing.

WHEREFORE, Debtor prays that this Court will enter an Order as follows:

- a. Deny the Motion requesting modification of the automatic stay;
- b. Deny all attorney fees and costs to Movant;
- c. Deny immediate enforcement of an Order granting relief from the Automatic Stay; and
- d. Grant such other relief as is deemed appropriate.

Respectfully submitted,

Purcell, Krug & Haller

By: /s/ Lisa A. Rynard

Lisa A. Rynard, Esquire
1719 N. Front Street
Harrisburg, Pa 17102
(717) 234-4178
lrynard@pkh.com